

Jeffrey N. Pomerantz, Esq.  
Andrew W. Caine, Esq.  
(admitted *pro hac vice*)  
PACHULSKI STANG ZIEHL & JONES LLP  
10100 Santa Monica Boulevard  
Los Angeles, California 90067-4100  
Telephone: (310) 277-6910  
Telecopy: (310) 201-0760

Lynn L. Tavenner, Esq. (VA Bar No. 30083)  
Paula S. Beran, Esq. (VA Bar No. 34679)  
TAVENNER & BERAN, PLC  
20 North Eighth Street, 2<sup>nd</sup> Floor  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
Telecopy: (804) 783-0178

- and -

Robert J. Feinstein, Esq.  
(admitted *pro hac vice*)  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 36<sup>th</sup> Floor  
New York, New York 10017  
Telephone: (212) 561-7700  
Telecopy: (212) 561-7777

*Counsel to the Liquidating Trustee*

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION

In re:

CIRCUIT CITY STORES, INC., et al.,  
  
Debtors.

Chapter 11

Case No. 08-35653-KRH

STIPULATION AND [PROPOSED] ORDER  
BETWEEN CREDITOR CHK, LLC AND  
CIRCUIT CITY STORES, INC.  
LIQUIDATING TRUST TO ALLOW  
WITHDRAWAL OF CLAIM

Jointly Administered

STIPULATION

This Stipulation is entered into and submitted by and between Creditor CHK, LLC  
("CHK") on the one hand, and Circuit City Stores, Inc. Liquidating Trust (the "Trust"), on the  
other hand, and by and through their respective counsel of record.

WHEREAS, CHK also filed administrative claim No. 14346 (“Claim No. 14346”) against Circuit City Stores, Inc. on June 30, 2009;

WHEREAS, the Trust objected to Claim No. 14346 in its First Omnibus Objection to Claims dated February 23, 2011;

WHEREAS, the Trust and CHK have periodically agreed to continuances of the hearing on the Trust’s objections since the First Omnibus Objection to Claims was filed;

WHEREAS, the Fund wishes to withdraw Claim No. 14346 filed in the above-captioned bankruptcy cases (the “Bankruptcy Cases”) with prejudice;

WHEREAS, the Trust consents to the withdrawal with prejudice of administrative Claim No. 14346 filed in the Bankruptcy Cases;

IT IS HEREBY STIPULATED AND AGREED, by and between CHK and the Trust, through their respective counsel of record, as follows:

1. CHK’s administrative Claim No. 14346 shall be withdrawn with prejudice.

IT IS SO STIPULATED.

Dated: August 16, 2016

TAVENNER & BERAN, PLC

By: /s/ Paula S. Beran  
Lynn L. Tavenner  
Paula S. Beran  
Counsel to the Circuit City Stores Inc.  
Liquidating Trust

Dated: August 16, 2016

CHRISTIAN & BARTON, LLP

By: /s/ Jennifer M. McLemore  
Jennifer M. McLemore  
Attorneys for CHK, LLC

**[PROPOSED] ORDER**

Pursuant to the Stipulation of the parties set forth above,

1. The Stipulation is approved.
2. CHK, LLC's administrative Claim No. 14346 is hereby withdrawn with prejudice.
3. The Clerk of this Court is hereby authorized and instructed to reflect these

withdrawals on the official claims register for the above-referenced Debtors.

4. This Court shall retain jurisdiction to enforce this Stipulation.

IT IS HEREBY ORDERED:

Dated: \_\_\_\_\_

\_\_\_\_\_  
Judge of the United States Bankruptcy Court